

Sealed

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA

§

VS

§

CRIMINAL NO.

B-17-440,

GRACIELA LOPEZ-RANGEL
JESSICA ALEXA LAMAS
ALMA DELIA MARIN-FUENTES

§

**SEALED
INDICTMENT**

United States District Court
Southern District of Texas
FILED

JUN 27 2017

THE GRAND JURY CHARGES:

David J. Bradley, Clerk of Court

COUNT 1

On or about June 5, 2017, in the Southern District of Texas and within the
jurisdiction of the Court, Defendants

**GRACIELA LOPEZ-RANGEL,
JESSICA ALEXA LAMAS,
and
ALMA DELIA MARIN-FUENTES**

did knowingly and willfully conspire and agree with other persons known and unknown to
the Grand Jurors to violate Title 8, United States Code, Sections 1324(a)(1)(A)(ii), and
(iii), that is, the object of their conspiracy and agreement was to transport and move and
attempt to transport and move by means of a motor vehicle and conceal, harbor and
shield from detection and attempt to conceal, harbor and shield from detection by means
of a building and other means of transportation, an alien who had come to, entered, and
remained in the United States, in violation of law, and in furtherance of said alien's illegal
presence in the United States.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and

1324(a)(1)(B)(i).

COUNT 2

On or about June 5, 2017, in the Southern District of Texas and within the jurisdiction of the Court, Defendants

**GRACIELA LOPEZ-RANGEL
and
JESSICA ALEXA LAMAS,**

knowing and in reckless disregard of the fact that a certain alien, Humberto Esteban Ibarra-Escobedo, had come to, entered, and remained in the United States in violation of law, did transport and move, and attempt to transport and move such alien within the United States, from near Brownsville, Texas, to near Harlingen, Texas, by means of a motor vehicle, in furtherance of such violation of law for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II) and 1324(a)(1)(B)(i).

COUNT 3

On or about June 5, 2017, in the Southern District of Texas and within the jurisdiction of the Court, Defendants

**GRACIELA LOPEZ-RANGEL
and
JESSICA ALEXA LAMAS,**

knowing and in reckless disregard of the fact that a certain alien, Jose Raul Mauricio-Medina, had come to, entered, and remained in the United States in violation of law, did transport and move, and attempt to transport and move such alien within the United States, from near Brownsville, Texas, to near Harlingen, Texas, by means of a motor

vehicle, in furtherance of such violation of law for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II) and 1324(a)(1)(B)(i).

COUNT 4

On or about June 5, 2017, in the Southern District of Texas and within the jurisdiction of the Court, Defendants

**GRACIELA LOPEZ-RANGEL
and
JESSICA ALEXA LAMAS,**

knowing and in reckless disregard of the fact that a certain alien, Gonzalo Rivera-Medina, had come to, entered, and remained in the United States in violation of law, did transport and move, and attempt to transport and move such alien within the United States, from near Brownsville, Texas, to near Harlingen, Texas, by means of a motor vehicle, in furtherance of such violation of law for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II) and 1324(a)(1)(B)(i).

COUNT 5

From on or about June 3, 2017, until on or about June 5, 2017, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

ALMA DELIA MARIN-FUENTES

knowing and in reckless disregard of the fact that an alien, Humberto Esteban Ibarra-Escobedo, had come to, entered, and remained in the United States in violation of law,

did conceal, harbor, and shield and attempt to conceal, harbor and shield from detection such alien in buildings and other places and by means of transportation, in furtherance of such violation of law for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II) and 1324(a)(1)(B)(i).

COUNT 6

From on or about June 3, 2017, until on or about June 5, 2017, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

ALMA DELIA MARIN-FUENTES

knowing and in reckless disregard of the fact that an alien, Jose Raul Mauricio-Medina, had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield and attempt to conceal, harbor and shield from detection such alien in buildings and other places and by means of transportation, in furtherance of such violation of law for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II) and 1324(a)(1)(B)(i).

COUNT 7

From on or about June 3, 2017, until on or about June 5, 2017, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

ALMA DELIA MARIN-FUENTES

knowing and in reckless disregard of the fact that an alien, Gonzalo Rivera-Medina, had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield and attempt to conceal, harbor and shield from detection such alien in

buildings and other places and by means of transportation, in furtherance of such violation of law for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II) and 1324(a)(1)(B)(i).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

ABE MARTINEZ
ACTING UNITED STATES ATTORNEY



Justin S. Dinsdale
Assistant United States Attorney